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2015 APR 15 PM 2014

CLERK US DISTRICT COURT  
DISTRICT OF ARIZONA

7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE DISTRICT OF ARIZONA

10 United States of America,

11 Plaintiff,

12 vs.

13 Ryan Galal VanDyck,  
(Counts 1 and 2)  
14 Jannae Knight  
(Count 1)

15 Defendants.

16 INDICTMENT

Violation:

18 U.S.C. §§ 2251(a) and (e)  
(Conspiracy to Produce Child  
Pornography)

18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2)  
(Possession of Child Pornography)

17 THE GRAND JURY CHARGES:

18 COUNT ONE

20 CONSPIRACY TO PRODUCE CHILD PORNOGRAPHY

21 From at least March 2014 to on or about April 10, 2015, within the District of  
22 Arizona and elsewhere, the defendants, RYAN GALAL VANDYCK and JANNAE  
23 KNIGHT, did knowingly and intentionally combine, conspire, confederate and agree  
24 with each other and other persons unknown to the grand jury to employ, use, persuade,  
25 induce, entice and coerce a minor to engage in sexually explicit conduct, as that term is  
26 defined in Title 18, United States Code, Section 2256(2), for the purpose of producing  
27  
28

CKJ  
(BPV)

1 any visual depiction of such conduct, using materials that have been mailed, shipped and  
2 transported in and affecting interstate and foreign commerce by any means, including a  
3 cell phone and computer, all in violation of Title 18, United States Code, Sections  
4 2251(a) and (e).  
5

6 **COUNT TWO**

7 **POSSESSION OF CHILD PORNOGRAPHY**

8 On or about April 10, 2015, in the District of Arizona, RYAN GALAL  
9 VANDYCK did knowingly possess child pornography, that is, visual depictions, the  
10 production of which involved the use of minors, including prepubescent minors,  
11 engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section  
12 2256(2), and which depicted such conduct, that had been mailed, shipped and transported  
13 in interstate and foreign commerce by any means, including computer, and which were  
14 produced using materials that had been mailed and shipped and transported in interstate  
15 and foreign commerce; that is, RYAN GALAL VANDYCK knowingly possessed a blue  
16 HP laptop computer, which contained child pornography videos, which included, but  
17 were not limited to, the following computer file: "Lolitashouse - Luba Shasha Vika.avi".  
18 All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).  
19

20 A TRUE BILL

21 / s /

22 Presiding Juror

23 JOHN S. LEONARDO  
24 United States Attorney  
District of Arizona

25 / s / APR 15 2015

26 Carmen F. Corbin  
27 Assistant U.S. Attorney

28 **REDACTED FOR  
PUBLIC DISCLOSURE**

United States of America v. VanDyck, et al  
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